

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASA EXPRESS CORP, as Trustee of CASA
EXPRESS TRUST,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

18 Civ. 11940
[rel. 19 Civ. 3123]

[PROPOSED] JUDGMENT

Plaintiff, as Trustee of Casa Express Trust, having moved this Court for summary judgment, and the matter having come before the Honorable Analisa Torres, United States District Court, and the Court having granted summary judgment pursuant to an Order dated September 30, 2020, and directed that judgment be entered for the principal amount of the bonds described below, plus accrued interest through the date of judgment,

NOW, it is hereby, **ORDERED, ADJUDGED, AND DECREED** that Casa Express Trust shall recover from Defendant, the Bolivarian Republic of Venezuela (the “Republic”), as follows:

1. With respect to Casa Express Trust’s beneficial ownership of \$1,845,000 principal amount of the series of bonds issued by the Republic designated ISIN US922646AT10, Casa Express Trust shall recover from the Republic: (i) \$1,845,000 (representing unpaid principal due August 15, 2018); *plus* (ii) \$754,143.78 (representing six due and unpaid biannual interest payments due on February 15, 2018, August 15, 2018, February 15, 2019, August 15, 2019, February 15, 2020, and August 15, 2020); *plus* (iii) \$94,712.19 (representing 9% simple interest, the statutory pre-judgment interest rate, accruing through October 7, 2020, on each of the six due and unpaid biannual interest payments noted in the previous clause); *plus* (iv) \$36,310.63

(representing interest on the \$1,845,000 in unpaid principal at the rate of 13.625% computed starting on August 16, 2020, and ending on October 7, 2020); *plus* (v) \$ _____ (representing an additional \$884.23 per day in contract interest on unpaid principal and statutory pre-judgment interest on unpaid biannual interest for each calendar day following October 7, 2020, through the date on which this Judgment is entered on the docket of the Court); *plus* (vi) attorney's fees and costs in an amount to be determined; *plus* (vii) post-judgment interest as set forth in 28 U.S.C. § 1961(a).

2. With respect to Casa Express Trust's beneficial ownership of \$27,170,000 principal amount of the series of bonds issued by the Republic designated ISIN USP9395PAA95, Casa Express Trust shall recover from the Republic: (i) \$27,170,000 (representing unpaid principal due August 15, 2018); *plus* (ii) \$11,105,737.50 (representing six due and unpaid biannual interest payments due on February 15, 2018, August 15, 2018, February 15, 2019, August 15, 2019, February 15, 2020, and August 15, 2020); *plus* (iii) \$1,394,758.92 (representing 9% simple interest, the statutory pre-judgment interest rate, accruing through October 7, 2020, on each of the six due and unpaid biannual interest payments noted in the previous clause); *plus* (iv) \$534,720.69 (representing interest on the \$27,170,000 in unpaid principal at the rate of 13.625% computed starting on August 16, 2020, and ending on October 7, 2020); *plus* (v) \$ _____ (representing an additional \$13,021.49 per day in contract interest on unpaid principal and statutory pre-judgment interest on unpaid biannual interest for each calendar day following October 7, 2020, through the date on which this Judgment is entered on the docket of the Court); *plus* (vi) attorney's fees and costs in an amount to be determined; *plus* (vii) post-judgment interest as set forth in 28 U.S.C. § 1961(a).

It is further **ORDERED** that, until further notice from the Court, Casa Express Trust must refrain from selling or otherwise transferring its beneficial interests in the bonds involved in this action without advising the Court in advance and obtaining permission of the Court.

Dated: New York, New York
October __, 2020

Hon. Analisa Torres
District Judge